

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Preparation for International  
Telecommunications Union  
World Radiocommunication  
Conferences

ET Docket  
No. 93-198

Comments

Constellation Communications, Inc. ("CCI") submits these comments in response to the Commission's Notice of Inquiry ("Notice") released June 28, 1993 in the above captioned matter.

CCI is one of the pending applicants for a low earth orbit ("LEO") satellite system in the 1610-1626.5 MHz and 2483.5-2500 MHz band allocated to the mobile satellite service ("MSS") and the radiodetermination satellite service ("RDSS"). CCI believes it important that WRC-95 address a number of issues relating to the implementation of MSS and RDSS systems. Although CCI supports the implementation of the new MSS allocations between [1 and 3] GHz made by the 1992 WARC at an earlier date than that provided by RR 746B, CCI believes that the U.S. should seek a broader scope of MSS and RDSS issues for the WRC-95 and WRC-97 agendas.

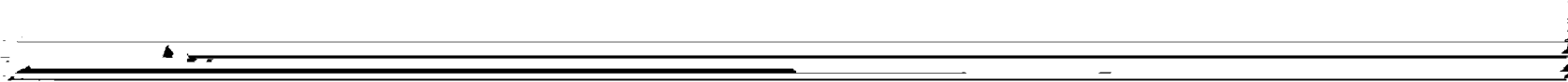



The first area involves the various footnotes applied to the 1610-1626.5 MHz and 2483.5-2500 MHz bands that involve the relationship between the various services to which these bands are allocated. The ambiguous language in these footnotes can lead to results that are inconsistent with the intent of the

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United States proposals to the 1992 WARC to add MSS to these bands on a co-equal primary basis in all three ITU Regions. CCI believes that these footnotes should be revised to remove any implications that MSS or RDSS in these bands have less than full co-equal primary status with all other primary services in these bands. With respect to the 2483.5-2500 MHz band, related issues are the question of whether the power flux density limit should be raised to a higher level than that specified in the Radio Regulations, and the question of possible restrictions on ISM emissions in this part of the overall ISM band.

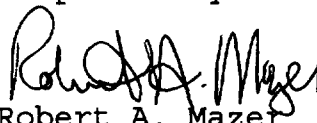
CCI also believes that the WRC-95 should also address feeder links for LEO MSS/RDSS systems. In particular, CCI believes that the 5150-5250 MHz band is an attractive band for LEO feeder links because of its current light use for either terrestrial or space communications. Although any fixed satellite service ("FSS") band can be used for LEO feeder links



that priority of communications should be afforded explicitly to maritime and/or aeronautical safety communications in any bands outside of the 1525-1559 MHz and 1626.5-1660.5 MHz bands.

In conclusion, CCI believes that the Commission should seek to have the WRC-95 and WRC-97 agendas include a broader treatment of MSS and RDSS issues than simply advancement of the implementation dates for the new MSS allocations adopted at the 1992 WARC. Several specific issues are identified above. CCI believes that the wording of these MSS/RDSS agenda items should be kept broad at this time so that maximum flexibility is maintained by the U.S. to seek any changes to the international Radio Regulations needed to implement the national MSS/RDSS licensing decisions to be made over the next few years.

Respectfully submitted,



Robert A. Mazer  
Nixon, Hargrave, Devans & Doyle  
One Thomas Circle, N.W.  
Washington, D.C. 20005  
(202) 457-5300

July 19, 1993

**CERTIFICATE OF SERVICE**

I, Robert A. Mazer, hereby certify that a copy of the foregoing document was served by first-class mail, postage prepaid, this 19th day of July, 1993 on the following persons:

\*Acting Chairman James H. Quello  
Federal Communications Commission  
Room 802  
1919 M Street, N.W.  
Washington, D.C. 20554

\*Commissioner Andrews C. Barrett  
Federal Communications Commission  
Room 844  
1919 M Street, N.W.  
Washington, D.C. 20554

\*Commissioner Ervin S. Duggan  
Federal Communications Commission  
Room 832  
1919 M Street, N.W.  
Washington, D.C. 20554

\*Thomas P. Stanley  
Chief Engineer  
Federal Communications Commission  
2025 M Street, N.W.  
Washington, D.C. 20554

\*Kathleen Levitz  
Acting Chief, Common Carrier Bureau  
Federal Communications Commission  
Room 500  
1919 M Street, N.W.  
Washington, D.C. 20554

\*Tomas S. Tcyz  
Deputy Chief, Domestic Facilities Division  
Common Carrier Bureau  
Federal Communications Commission  
Room 6010  
2025 M Street, N.W.  
Washington, D.C. 20554

\* Via Hand Delivery

\*Cecily C. Holiday, Esq.  
Chief, Satellite Radio Branch  
Federal Communications Commission  
Room 6324  
2025 M Street, N.W.  
Washington, D.C. 20554

\*Fern Jarmulnek, Esq.  
Satellite Radio Branch  
Federal Communications Commission  
Room 6324  
2025 M Street, N.W.  
Washington, D.C. 20554

\*Kristi L. Kendall, Esq.  
Staff Attorney  
Federal Communications Commission  
Room 6334A  
2025 M Street, N.W.  
Washington, D.C. 20554

\*Raymond LaForge  
Federal Communications Commission  
Room 7334  
2025 M Street, N.W.  
Washington, D.C. 20554

Lon Levin, Esq.  
Vice President and Regulatory Counsel  
AMSC  
1150 Connecticut Avenue, N.W.  
4th Floor  
Washington, D.C. 20036

Bruce D. Jacobs, Esq.  
Fisher, Wayland, Cooper & Leader  
1255 23rd Street, N.W.  
Suite 800  
Washington, D.C. 20037

Jamie Ennis  
Motorola Satellite Services, Inc.  
1350 Eye Street, N.W.  
Suite 400  
Washington, D.C. 20005

Victor J. Toth, P.C.  
CELSAT, Inc.  
2719 Soapstone Drive  
Reston, Virginia 22091

Gerald Helman  
MCHI  
1120 19th Street, N.W.  
Suite 460  
Washington, D.C. 20036

Norman Leventhal, Esq.  
Raul Rodriguez, Esq.  
Leventhal, Senter & Lerman  
2000 K Street, N.W.  
Suite 600  
Washington, D.C. 20006

Philip L. Malet, Esq.  
Steptoe & Johnson  
1330 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Veronica Haggart, Esq.  
Vice President & Director  
Regulatory Affairs  
Motorola, Inc.  
Suite 400  
1350 I Street, N.W.  
Washington, D.C. 20005

Leslie Taylor, Esq.  
Leslie Taylor Associates  
6800 Carlynn Court  
Bethesda, Maryland 20817-4302

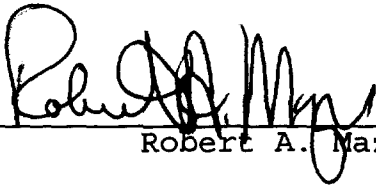
Linda Smith, Esq.  
Robert M. Halperin, Esq.  
Crowell & Moring  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004-2505

Dr. Robert L. Riemer  
Committee on Radio Frequencies  
National Research Council  
HA-562  
2101 Constitution Avenue, N.W.  
Washington, D.C. 20418

Mr. Richard G. Gould  
Telecommunications Systems  
1629 K Street, N.W.  
Suite 600  
Washington, D.C. 20006

Cheryl Lynn Schneider, Esq.  
COMSAT  
950 L'Enfant Plaza, S.W.  
Washington, D.C. 20024

Jill Abeshouse Stern  
Shaw, Pittman, Potts & Trow Bridge  
2300 N Street, N.W.  
Washington, D.C. 20037



Robert A. Mazer